

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE MANUEL GOMEZ DE JESUS
KEREN AGOSTO TORRES

DEBTORS

CASE NO. 19-04007/ESL

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S MOTION FOR COPY OF TAX RETURN,
DOCKET NO. 19**

TO THE HONORABLE COURT:

NOW COME, JOSE MANUEL GOMEZ DE JESUS and KEREN AGOSTO TORRES, the Debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion for Copy of Tax Return*, Docket No. 19, requesting the Court to Order the Debtor to provide a copy of the Debtors' 2019, 2020, 2021 and 2022, tax returns.

2. The Debtors hereby respectfully inform this Honorable Court that on January 11, 2024, the Debtors sent to the Trustee (uploaded to the Trustee's system) a copy of the Debtor's 2019, 2020, 2021, and 2022 tax returns.

3. Based on the above stated, the Debtors respectfully request that this Honorable Court be informed of the foregoing and grant the present motion in reply to the *Trustee's Motion for Copy of Tax Return*, Docket No. 19, in the above captioned case.

WHEREFORE, the Debtors, through the undersigned attorney respectfully request that this Honorable Court grant the foregoing motion in reply to the *Trustee's Motion for Copy of Tax Return*, Docket No. 19, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to the CM/ECF participants, including the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to Debtors, Jose Manuel Gomez De Jesus and Keren Agosto Torres, to the address of record: HC2 Box 7510, Las Piedras PR 00771.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 11th day of January, 2024.

/s/Roberto Figueroa Carrasquillo

USDC 203614

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